

An open letter to Scott State, CEO of NorthStar and Waste Control Specialists, Texas

I am a member of the Safe and Green Campaign that worked for years to close VY. Now we're in a whole new ballgame. I want it to be cleaned up while those of us who used its electricity are here to take the responsibility for making sure the process is done right.

I want to address clause #8 in the MOU between the State of Vermont, Entergy, NorthStar, the New England Coalition, the Elnu Abenaki, and others. Clause 8 is very short: "NorthStar agrees to collaborate with the stakeholders to establish an appropriate public engagement process regarding the decommissioning and restoration of the VY Station site, including exploration of forming a subcommittee of the existing Nuclear Decommissioning Citizens Advisory Panel for this purpose."

I think we can all agree that this is a rather vague clause. Who are "the stakeholders"? What does "an appropriate public engagement process" look like? What would its purpose and scope be?

My hope is that NorthStar and the Nuclear Decommissioning Citizens Advisory Panel (NDCAP) will take what I'm about to say to heart and develop much clearer goals and procedures, and that you will do so with public input into what that should look like.

Here's what I want to say about "public engagement":

- First, whoever owns VY has tremendous power in the process of decommissioning, but it is the people who live and work here who will bear the consequences of any missteps or cost overruns, and benefit from a job well done. True public engagement requires acceptance that the owner of VY is, in fact, accountable to us. Yes, you're accountable to your shareholders, and to the NRC, and to the State of Vermont, but on the most human and fundamental level, the owner is accountable to us and our children for many generations. All those other corporate and bureaucratic structures are supposed to be about safeguarding our community and our land and waters. Never forget that.
- Second, "the public" is not monolithic in terms of what we know about nuclear power and decommissioning, nor are we all on the same page when it comes to how much we trust corporations and regulators, or what we think should be done here. You heard a small example of that at the last Vermont NDCAP meeting, where some people voiced distrust of the NRC and Entergy, and a rather frustrated resident of Vernon expressed his view that our distrust was disrespectful. No matter how much we disagree, all voices deserve to be heard and considered. Further, it will not work well to only have opportunities for presentations and questions and answers. It will work better to also have facilitated dialogues that allow people with differing perspectives to listen to and learn from each other.
- Third, you are in a state and a region that thinks for itself. We don't always agree with each other, but we sure do all have strong opinions about what should happen. In our different ways, we are all activists, and we will be active in this decommissioning process, one way or another, either through TRULY appropriate, meaningful, and mutually respectful engagement with each other and the owner of VY, or from outside an inadequate process that is not trustworthy and transparent.
- Fourth, in order to meaningfully engage in dialogue about decommissioning VY, most members of the public will need and appreciate education about the process itself, and about the regulatory and oversight structures involved. Education does NOT include marketing presentations from companies that have a financial stake in decommissioning, or if it does, then it also includes more neutral sources of information. It's my understanding that the public engagement process during Maine Yankee's decommissioning has a lot to teach us here. But it's important to always remember: We are not necessarily technical experts, but we do have questions and opinions that deserve respect from people who are experts because we are the experts on our own lives, and we live here.
- Fifth, public engagement means that you can't hide behind "we have met all the standards and followed all the regulations" and expect us to feel reassured. You need to understand that many people in this community, from long and distasteful experience, think that the NRC puts the interests of the industry above our safety.
- Sixth, there are many of us who, after dealing with Entergy's lies, obfuscations, lawsuits, and utter disrespect will have a hard time trusting ANY corporation that has a profit motive to cut corners in cleaning

up our precious land and water. You have a hard act to follow; you are going to have to work extra hard to win our trust because Entergy was so utterly untrustworthy. And in this same vein, it will not go over well for you to become offended when someone in our community expresses distrust of your intentions and methods. It's up to you to convince us that our safety and our land are your top priority.

- Seventh, in this same vein of winning our trust, you need to know that at the March 2018 Vermont NDCAP meeting, you lost ground in building trust with our community – and you haven't even purchased VY yet. You were directly questioned by a knowledgeable NDCAP panel member who stated her understanding that your plans to remove high level nuclear waste from VY to your Waste Control Specialists (WCS) site in Texas would require a change in federal law. You definitively stated that it would not, but you refused to say what gave you a basis for saying this, citing a need to protect proprietary information. Once you own both VY and WCS, do you believe you will have NRC permission to ship this incredibly dangerous material over thousands of miles because you're just transferring it from one site of your company to another? Are you counting on some "pilot project" deal that skirts federal regulation? Your response was disheartening, to say the very least.
- And for my final point, I'm going to repeat myself. The owner of Vermont Yankee is accountable to the people who live and work in this region, and to our children and grandchildren and their children and grandchildren. You can try to sidestep this reality all you want, but you cannot change it.